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KING COUNTY
SUPERIOR COURT CLERK
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CASE #: 26-2-11907-4 SEA

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

ALEXANDRA GREENSTEIN, Plaintiffs, v. SEATTLE PUBLIC SCHOOLS, a Washington municipal corporation, Defendant.	No. COMPLAINT

COMES NOW, Plaintiff ALEXANDRA GREENSTEIN, by and through her counsel of record, and avers and complains as follows:

I. PARTIES

1.1. Plaintiff Alexandra Greenstein was, at all times relevant herein, a resident of the State of Washington.

1.2. Defendant Seattle Public Schools is a Washington municipal corporation and the governing body for public schools in Seattle, Washington.

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II. JURISDICTION AND VENUE

2.1. The Superior Court of the State of Washington has subject matter jurisdiction over this action pursuant to RCW 2.08.010.

2.2. Jurisdiction over Defendant Seattle Public Schools lies pursuant to RCW 4.96.010 by virtue of the commission of tortious conduct.

2.3. Venue is proper in King County, Washington pursuant to RCW 4.12.025.

2.4. Plaintiff served a Tort Claim Form on Defendant Seattle Public Schools on December 16, 2025 pursuant to RCW 4.96, *et seq.*

III. FACTS

3.1. Nathan Hale High School is a public high school under the control and direction of Defendant Seattle Public Schools.

3.2. Alexandra Greenstein was a student at Nathan Hale High School from 2022-2025.

3.3. Ms. Greenstein endured rampant antisemitic harassment and bullying at Nathan Hale High School throughout the 2023–24 and 2024–25 school years following the October 7, 2023, attack on Israel by Hamas.

3.4. The antisemitic harassment included racial slurs and insults, offensive drawings of Swastikas, and intimidation and bullying in person and online.

3.5. Ms. Greenstein was in dire fear of being the victim of antisemitic violence.

3.6. Antisemitism at Nathan Hale High School increased following the October 7, 2023 during Ms. Greenstein's Junior year.

3.7. Ms. Greenstein is proudly Jewish, but she quickly began to fear revealing her Jewish identity to classmates out of fear for her safety, including telling people she moved to Seattle from California, where she was born, rather than Israel, where she lived most of her life.

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3.8. Antisemitic and anti-Israeli phrases and remarks were constant refrains throughout the school, and hate-graffiti of swastikas scrawled across walls was left uncovered by school administrators.

3.9. Nathan Hale High School promoted Middle Eastern and Arab cultures by incorporating them into a Cultural Fashion Show and promoting participation in the Free Palestine movement but excluded reference to Jewish and Israeli culture from being represented in any capacity.

3.10. Anti-Israel posters, fliers, and stickers were posted with the approval of the school administration and handed out by Seattle Public Schools employees.

3.11. Ms. Greenstein was harassed because of her Jewish identity with phrases like "baby killer" and "Islamophobic."

3.12. Ms. Greenstein reported this harassment and bullying to her teachers and the administration; however, they dismissed, denied, or minimized Ms. Greenstein's experiences.

3.13. The harassment visited upon Ms. Greenstein because of her Jewish identity caused her severe emotional distress which had a visible effect on Ms. Greenstein's appearance.

3.14. Even after another Jewish student at Nathan Hale was assaulted by antisemitic bullies, Seattle Public Schools took no steps to protect Jewish students from foreseeable harm.

3.15. Ms. Greenstein returned to Nathan Hale for her Senior year in the 2024-25 school year only to find that the antisemitic culture was unchanged.

3.16. In Senior English class, Ms. Greenstein was accused in class of supporting ethnic cleansing and genocide because of her Jewish identity.

3.17. The accusation greatly disturbed Ms. Greenstein.

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3.18. When Ms. Greenstein sought assistance from the school's social worker, Lyndsey Johnson, Ms. Johnson admitted that antisemitism at the school was pervasive.

3.19. However, despite this acknowledgment, no faculty member or administrator took any action to address the antisemitism, and Ms. Johnson in particular took no steps to address Ms. Greenstein's objective distress.

3.20. Ms. Greenstein has a diagnosed anxiety disorder and began demonstrating trauma symptomology after her experiences of antisemitic harassment at Nathan Hale High School.

3.21. Because Seattle Public Schools refused to create a safe environment for Ms. Greenstein to learn, she missed most of her final years of high school, transforming her goals of graduating to set up her future into a goal of escape.

IV. CAUSES OF ACTION

First Cause of Action: *Religious Discrimination*

4.1 The Washington Law Against Discrimination, RCW 49.60, *et seq.*, forbids discrimination on the basis of race, creed, color, national origin in places of public accommodation.

4.2 School districts are places of public accommodation.

4.3 Alexandra Greenstein was a student assigned to Seattle Public Schools.

4.4 Ms. Greenstein identifies as Jewish.

4.5 The acts and omissions of Seattle Public Schools and their employees subjected Ms. Greenstein to discrimination and harassment because of her Jewish identity.

4.6 Ms. Greenstein suffered discrimination and harassment that was sufficiently severe, pervasive, and objectively offensive that it created a hostile environment that deprived her

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of equal access to the educational benefits and opportunities that Seattle Public Schools provides to non-Jewish students.

4.7 The deprivation of the full enjoyment of the public school has caused Ms. Greenstein physical and emotional injury.

Second Cause of Action: *Outrage*

4.8 The virulent antisemitism at Nathan Hale High School was extreme and outrageous.

4.9 Despite having knowledge of specific instances of threatening and abusive behavior toward Ms. Greenstein, Seattle Public Schools intentionally and recklessly failed to intervene, investigate, notify law enforcement, or discipline any aggressors.

4.10 Seattle Public Schools was aware of the significant probability that their inaction would cause severe emotional distress but deliberately disregarded such probability.

4.11 Seattle Public Schools' extreme and outrageous conduct went beyond all possible bounds of decency.

4.12 Ms. Greenstein has actually experienced emotional distress as a result.

Third Cause of Action: *Negligence*

4.13 Seattle Public Schools owed a duty of reasonable care to (1) protect Ms. Greenstein from foreseeable harm, (2) to anticipate harm which may reasonably be anticipated and take necessary precautions to protect Ms. Greenstein from such harm, (3) to respond appropriately once they become aware that students in their custody are engaging in harassment, intimidation, and bullying of other students, and (4) to ensure their staff and employees are properly trained to perform all their duties.

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4.14 Antisemitic harassment of Ms. Greenstein was reasonably foreseeable given the pervasive antisemitism rampant at Nathan Hale High School was known to Seattle Public Schools.

4.15 Seattle Public Schools failed to exercise reasonable care to (1) protect Ms. Greenstein from foreseeable harm, (2) take prompt and appropriate action to stop the antisemitic harassment of Ms. Greenstein, (3) adequately train their employees in how to respond to harassment, intimidation, and bullying, especially against Ms. Greenstein and other Jewish students, and (4) educate other students about antisemitism and the odiousness of harassment, intimidation, and bullying for being Jewish.

4.16 Seattle Public Schools' breach of duty proximately caused physical and emotional injury to Alexandra Greenstein.

V. RESERVATION OF RIGHTS

5.1. Further particulars of Defendant's liability are likely to become evident through the discovery process.

5.2. Plaintiff reserves the right to amend this complaint and/or to present further allegations consistent with the evidence to the fullest extent permitted under Washington law.

VI. DAMAGES

6.1. As a direct and proximate result of the tortious conduct of the named Defendant, Plaintiff suffered elements of compensable damages, including but not limited to:

a. Plaintiff's medical costs – past, present, and future;

b. the reasonable value of out-of-pocket expenses incurred by Plaintiff; and

c. Plaintiff's noneconomic damages,

the precise details of which to be established at trial.

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VII. PRAYER FOR RELIEF

7.1. WHEREFORE, having fully identified the injuries and damages sustained by Plaintiff and the legal duties breached by Defendant that were the direct and proximate cause of those injuries and damages, Plaintiff prays for the following relief:

a. judgment against the above-named Defendant in an amount sufficient to fully compensate Plaintiff for all damages established in this complaint with are proven at trial;

b. an award against these Defendants for attorneys' fees and statutory costs incurred in the filing of this action to the fullest extent permitted under Washington law;

c. an award of prejudgment and postjudgment interest to the fullest extent permitted under Washington law; and

d. such other and further relief as this Court deems just and equitable.

RESPECTFULLY SUBMITTED this 7th day of April 2026.

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